

Exhibit 2

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION MDL No. 2804
OPIATE LITIGATION Case No. 17-md-2804

This document relates to: Judge Dan
Aaron Polster

The County of Cuyahoga v. Purdue
Pharma, L.P., et al.
Case No. 17-OP-45005
City of Cleveland, Ohio vs. Purdue
Pharma, L.P., et al.
Case No. 18-OP-45132
The County of Summit, Ohio,
et al. v. Purdue Pharma, L.P.,
et al.
Case No. 18-OP-45090

Deposition of Matthew Baeppler
Cleveland, Ohio
January 17, 2019
9:05 a.m.

Reported by: Bonnie L. Russo
Job No. 3191692

1 Deposition of Matthew Baeppler held at:

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5 Zashin & Rich Co. LPA

6 950 Main Avenue

7 4th Floor

8 Cleveland, Ohio
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19 Pursuant to Notice, when were present on behalf
20 of the respective parties:
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C O N T E N T S

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(Exhibits included with transcript.)

1 counterfeit pills. In my experience, we've
2 only just recently seen counterfeit pills. And
3 that's -- that's been a new trend.

4 Q. Starting when, do you think?

5 A. In my experience, in the last year,
6 that I've personally seen them.

7 Q. In your mind, when did the opioid
8 epidemic begin?

9 A. I'm going to say in the -- sometime
10 in the 2000 -- we started -- we started to see
11 a real problem in about 2008, 2009. And it got
12 progressively worse.

13 And I base that on -- when I started
14 in the narcotics unit, we dealt almost ex -- it
15 was almost all crack or crack cocaine and
16 cocaine in forms almost exclusively. Within a
17 matter of six years or so, it switched to -- it
18 like literally flip flopped into now everyone's
19 selling heroin, dealer-wise.

20 So we'd have the same dealer that I
21 dealt with, you know, in let's say 2008; and in
22 2015 now -- you know, in 2008 he's selling
23 crack and cocaine. Now he's selling crack and
24 heroin or just heroin.

25 Q. Do you have a sense of what caused